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11 Attorney for Petitioner **Dollar**

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 Christopher Adam Dollar,

15 Petitioner,

16 v.

17 Harold Wickham And Attorney General Of
18 The State Of Nevada,

19 Respondents.

Case No. 2-13-cv-01952-JCM-GWF

**Unopposed Motion For Extension
Of Time To File Reply
(Third Request)**

DECLARATION OF JASON F. CARR

STATE OF NEVADA)

) ss:

COUNTY OF CLARK)

I, JASON F. CARR, hereby declare under penalty of perjury that the following is true and correct:

1. On November 28, 2017, this Court entered an order requesting the Respondent's to file an Answer to Petitioner's Petition. ECF 41. Respondent's filed their Answer on March 13, 2018. ECF 43. Petitioner previously was granted an extension of time. ECFs 44-45. Petitioner request a second extension of time on July 12, 2018. ECF 46.

2. This is a third request for an extension of time. Counsel is seeking an extension of eleven days, to and including August 21, 2018.

3. Counsel has many competing deadlines at the moment including an amended petition in a complex murder cases involving two trial. Additionally, counsel must travel to San Francisco for oral argument in another post-conviction matter.

4. For the reasons stated above, as well as the files and records in this case, I ask this Court to grant my request for an extension of time of eleven days, to or before August 21, 2018. This motion is not filed for the purposes of delay but in the interests of justice, as well as in the interests of Mr. Dollar.

5. On August 10, 2018, Deputy Attorney General Heidi Parry Stern indicated that she had no objection to this request, provided that Respondents' non-opposition

1 is not deemed an implied finding of any applicable time period limitations or the
2 waiver of any other procedural defense. Petitioner at all times remains responsible
3 for calculating any limitations periods. Dollar understands that, in granting an
4 extension request, this Court makes no finding or representation that the petition,
5 any amendments thereto, and/or any claims contained therein are timely.
6

7 I declare under the penalty of perjury that the foregoing is true and correct.
8

9 DATED this 10th day of August, 2018.

10 Respectfully submitted,

11 RENE L. VALLADARES
12 Federal Public Defender

13 /s/ Jason F. Carr

14 Jason F. Carr
15 Assistant Federal Public Defender

16 DATED August 23, 2018.

17
18 Renus C. Mahan
19 UNITED STATES DISTRICT
20 COURT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, District of Nevada by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: Heidi Parry Stern.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing by First-Class Mail, postage pre-paid, or have dispatched it to a third party commercial carrier for delivery within three calendar days, to the following non-CM/ECF participants:

Christopher Adam Dollar
#1063463
High Desert State Prison
P.O. Box 650
Indian Springs, NV 89070

/s/Marcus Walker
An Employee of the
Federal Public Defender